

REMARKS

Claims 1-11 and 13-15 have been amended. Support for claim amendments can be found at page 26 of the Specification. Claims 1-15 are pending and under consideration. Reconsideration is respectfully requested.

I. REJECTION OF CLAIMS 1-7, 9-13 AND 15 UNDER 35 U.S.C. § 102(e) AS BEING ANTICIPATED BY FATEHI (U.S. PATENT NO. 6,512,612):

Claim 1 has been amended to recite "two or more sub-switch units each receiving signals inputs, and switching and connecting the received signal inputs to the signal outputs, of only a portion of a total number of signals".

Further, claim 1 has been amended to recite "...the two or more sub-switch units are independent from one another and are not connected or switched between one another, thereby forming a non-complete switch, through which all the signal inputs to the apparatus are switched and connected".

FIG. 3a of Fatehi discloses a complete group of switches capable of connecting any one input to any one output. Further, FIG. 3 (including FIGs. 3A and 3B) discloses a plurality of connections (i.e., A, B, C, D, E, F and G) between the electronic (TDM) space switch/router 245 shown in FIG. 3B and the cross-connect fabric (optical space switch) 201 shown in FIG. 3A. That is, Fatehi discloses either one of the switches 201 or 245, switching a signal that is output from the other of the two, whereby the switch 201 is a main-switch and switch 245 is a sub-switch.

However, the present invention discloses a non-complete group of switches. Therefore, since the sub-switches of the present invention are mutually independent from one another (i.e., are not connected or switched between one another), as the number of wavelengths increases, additional sub-switches may be added and an administrator may determined how to connect the wavelength demultiplexing circuits, the wavelength multiplexing circuits and the sub-switches by considering which wavelengths transmitted from which lines must be switched and connected together.

Thus, the present invention eliminates the need for preparing a large-scale switch from an early stage at which the number of wavelengths is small.

Therefore, Fatehi teaches away from the present invention. Withdrawal of the rejection is respectfully requested.

II. REJECTION OF CLAIM 8 UNDER 35 U.S.C. § 103(a) AS BEING UNPATENTABLE OVER FATEHI IN VIEW OF KAMINOW (U.S. PATENT NO. 5,623,356):

The comments from section I may also be applied here. Kaminow fails to disclose the deficiencies of Fatehi mentioned above in section I.

III. REJECTION OF CLAIMS 9 AND 14 UNDER 35 U.S.C. § 103(a) AS BEING UNPATENTABLE OVER FATEHI:

The comments from section I may also be applied here.

IV. CONCLUSION:

In view of the foregoing amendments and remarks, it is respectfully submitted that each of the claims patentably distinguishes over the prior art, and therefore, defines allowable subject matter. A prompt and favorable reconsideration of the rejection along with an indication of allowability of all pending claims are therefore respectfully requested.

If there are any additional fees associated with filing of this Amendment, please charge the same to our Deposit Account No. 19-3935.

Respectfully submitted,

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Date:

Jan 13, 2005

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